

CHAPTER 3: HOUSING ELEMENT
(Reference §9J-5.010(3), F.A.C.)

§3-1: HOUSING GOALS, OBJECTIVES, AND IMPLEMENTING POLICIES. This section stipulates goals, objectives, and implementing policies for the Housing Element pursuant to ¶163.3177 (6) (f), F.S., and §9J-5.010(3) (a-c), F.A.C.

GOAL 3-1: HOUSING. Allocate land area for accommodating a supply of housing responsive to the diverse housing needs of the existing and projected future population and assist the private sector in providing affordable quality housing in neighborhoods protected from incompatible uses and served by adequate public facilities.

OBJECTIVE 3-1.1: PROVIDE AFFORDABLE QUALITY HOUSING AND ADEQUATE SITES FOR LOW AND MODERATE INCOME HOUSING. The City shall implement the below-stated policies in order to assist in accommodating the existing and projected housing need as estimated below. The Comprehensive Plan Housing Element Data Inventory and Analysis includes a tabular summary of documentary based data and methodology for the below stated estimates.

Housing Need	1990	1995	2010
Total Housing Need (Including Conventional & Affordable)	10,424	10,825	11,838
Owner-Occupied	4,384	4,557	4,984
Rental	6,040	6,268	6,854
Affordable Housing Need	3,677	3,815	4,173
Owner-Occupied	740	770	843
Rental	2,937	3,045	3,330

The above described housing need is supported by the affordable housing analysis and projected need contained in the Housing Element Data Inventory and Analysis. The estimated cumulative need for affordable housing is based on the existing and projected need among very low, low and moderate income households who either pay, or in the future anticipated to pay, more than thirty (30) percent of household income on housing. The affordable housing need is further impacted by the scheduled conversion of 308 affordable housing units during the period 1990 to 2010 as stated in the Data Inventory and Analysis. The City shall provide assistance in increasing affordable housing opportunities by carrying out measures stipulated in the below stated policies. In addition, the City of Key West shall revise and enforce the City's affordable housing ordinance (i.e., Growth Management Ordinance) which is designed to promote development of an adequate supply of affordable housing responsive to consumer demand. The ordinance shall provide incentives for affordable housing as described in the below stated policies. The ordinance shall be directed toward providing incentives for the private sector to meet specific housing needs. Affordable housing needs shall be evaluated and estimated on an annual basis through yearly updates of the growth management ordinance. There are no rural farm workers residing in the City of Key West.

Policy 3-1.1.1: Housing Assistance, Information and Referral Services. The Key West Housing Authority shall manage the City's 590 units of public housing and shall serve as the City's Community Development Office for purposes of Community Development Block Grant administration and continuing grantsmanship. The City's Housing Authority shall maintain and administer the City's 590 public housing units at the following locations: Fort Village, George Allen, Parker Place, and Robert Gabriel. The Authority shall also manage the 268 units of privately owned Section 8 and Rental Rehabilitation properties. In addition, the Authority shall coordinate with the City Commission in promoting additional day care facilities, achieving redevelopment, and neighborhood revitalization in declining subareas within Old Town.

The Key West Planning Department and the Key West Housing Authority shall provide technical assistance, information and referral services to the private sector in order to maintain a housing production capacity sufficient to meet the projected housing market demand and continue to advance fair housing and elimination of discrimination in housing.

Policy 3-1.1.2: Developing Public/Private Partnerships. Develop local government partnerships with the private sector in order to improve the efficiency and expand the capacity of the housing delivery system. Actions shall include coordinating the timing and location of City sanitary sewer facilities and Florida Keys Aqueduct Authority water services in order to promote the timely extension of water and wastewater services to residential areas as necessary. Similarly, the City shall also coordinate the installation of community facilities supportive to housing resources. Impact fee reductions shall be applied pursuant to formulas established in the Growth Management Ordinance in order to provide additional incentives for constructing affordable housing units. Such incentives shall be incorporated in the City's land development regulations upon plan adoption.

Policy 3-1.1.3: Additions to LDRs. Based on the Comprehensive Plan analysis of the "growth management," the City shall repeal the growth management ordinance and adopt as part of the land development regulations: 1) an affordable housing ordinance; and 2) a rate of growth ordinance.

Ratio of Affordable Housing to Be Made Available City-Wide: 1990-2010. The affordable housing ordinance shall stipulate that at least thirty percent (30%) of all residential units constructed each year shall be affordable as herein defined. Residential or mixed-use projects of less than ten (10) residential units shall be required to either develop thirty (30) percent of the units as affordable units on- or off-site, or contribute a fee in lieu thereof. However, residential projects of ten (10) units or more shall provide affordable units on- or off-site and will not have the option of fees in lieu of construction. Commercial developments shall be required to provide affordable housing units or fees in lieu thereof based on provisions to be included in the updated land development regulations.

Affordable Housing Trust Fund Be Established. The City shall establish and maintain an "affordable housing trust fund" with revenue received from "fees in lieu" of constructing required affordable housing as herein stipulated that is earmarked for the support and production of low and moderate income housing. The fees-in-lieu and the Housing Trust Fund shall not be commingled with general operating funds of the City of Key West. The trust fund shall be used for direct financial aid to developers as project grants and affordable housing project financing; direct or indirect aid to home buyers or renters as mortgage or rental assistance; and leverage to housing affordability, through site acquisition or development and housing conservation.

Impacted Land Uses. Any new commercial industrial, hotel/motel or multi-family housing development shall be required to provide affordable housing or make "fees in lieu" to the Housing Trust Fund. The formula for determining the number of affordable housing units (or "fees in lieu") to be provided by each type of development cited above shall be stipulated in the land development regulations. The formula for commercial, industrial and hotel/motel developments shall be based on an economic assessment to be undertaken as part of the City's Comprehensive Housing Affordability Study to be completed in FY 1992-93. This assessment shall provide a fair and equitable affordable housing unit threshold based on each 100 square feet of gross leasable (or total units in the case of multi-family units or hotel/motel units).

Affordable Housing Performance Criteria: The following performance criteria shall be incorporated in the affordable housing ordinances:

Affordable Housing Dwelling Unit Eligibility Requirements. The following criteria shall be required for dwelling units to qualify as affordable housing to the extent lawful; however, a waiver mechanism shall be provided in the land development regulations.

1. The dwelling unit shall have a sale price (including escrow requirements) less than or equal to three (3) times the median household income in Key West, or have rental rates, including sewer and solid waste charges, which are less than or equal to thirty (30) percent of median household income in Key West.

2. The dwelling unit shall be occupied by a household which meets all the "Applicant Eligibility Requirements for Affordable Housing" as herein stated.
3. The landlord of rental units shall perform routine maintenance and keep the units in standard condition.
4. The parcel and development shall meet all requirements of the City of Key West Land Development Regulations for the district in which the parcel is located.
5. Sites for affordable housing shall be approved if such sites have access to the following facilities, services and/or activity centers:
 - a. Serviced by potable water and central wastewater systems;
 - b. Accessible to employment centers, including shopping centers which accommodate stores offering household goods and services needed on a frequent and recurring basis;
 - c. Located on a paved street accessible to a major street (i.e., included in the City's major thoroughfare plan);
 - d. Accessible to public parks, recreation areas, and/or open space systems; and
 - e. Located on sites having adequate surface water management and solid waste collection and disposal.

Fees in lieu of construction of affordable housing shall be paid by developers if sites having required affordable housing do not have access to the facilities, services and/or activity centers listed above.

If possible, affordable housing sites should be accessible to social service centers which offer such services as counseling and day care.

6. Demonstration of continuing affordability shall be by deed restriction or any other method that effectively runs with the land.
7. The City will give priority to fill affordable housing vacancies which are accessible to the elderly or disabled non-elderly as well as priority to veterans.
8. The City will direct priority to occupancy of larger sized affordable housing units by families with more than four members.

Affordable Housing Applicant Eligibility Requirements. The following eligibility criteria shall be required for households qualifying for affordable housing units to the extent lawful; however, a waiver mechanism shall be provided in the land development regulations.

1. The household shall derive at least seventy percent (70%) of its household income from gainful employment in the City of Key West.
2. The total income of eligible households shall not exceed 70% of the median income for the City of Key West.
3. Eligibility is based on proof of legal residence in Key West for at least 12 months.
4. Single persons eligible for affordable housing shall be 18 years or older.
5. Priority shall be given to applicants whose head of household is elderly, disabled non-elderly, or a veteran.
6. Priority shall be given to larger families for larger sized affordable housing units.

7. The applicant shall execute a sworn affidavit stating the applicant's intention to occupy the dwelling unit.

Affordable Housing and Affordable Housing Applicant Eligibility Requirements for the Base Reuse sites shall be defined through the Housing Authority of the City of Key West's Affordability Policy, adopted July 1998. Amendments to said policy shall be incorporated into the Comprehensive Plan definition so long as they are first affirmatively approved by both the City of Key West and the Department of Community Affairs.

Said policy may be updated from time to time and shall be incorporated into the Comprehensive Plan definition, so long as they are first affirmatively approved by both the City of Key West and the Department of Community Affairs.

Relocation. Low and moderate income families who meet the "Affordable Housing Applicant Eligibility Requirements" and occupy housing which meets "Affordable Housing Dwelling Unit Eligibility Requirements" as herein stated shall not be displaced off-site by redevelopment activities which permit residential use.

Design Guidelines for Affordable Housing. Design elements which have proven successful in affordable housing developments which shall be encouraged by the City include:

1. Use of familiar material and forms;
2. Residential appearance;
3. Generous natural light and ventilation;
4. Private, easily identifiable outdoor space such as front porches;
5. Safe, well-lit areas for mail collection and group activities;
6. Front entrances visible from street or public areas;
7. Clear separation between cars and people; and
8. Barrier-free design for the elderly and handicapped.
9. Use of alternative energy technology for purposes of conserving natural resources and reducing user costs.

The "rate of growth ordinance" is addressed in Section II of the Compliance Agreement.

Policy 3-1.1.4: Selecting Sites for Affordable Housing for Low and Moderate Income Households. Upon plan adoption the City shall amend its land development regulations in order to include principles and criteria for locating low and moderate income housing. The City shall continue to promote access to a broad range of housing opportunities with a full complement of urban services through cooperation and coordination with the private sector and Monroe County.

Sites for affordable housing for low and moderate income households shall be approved if such sites have access to the following facilities, services and/or activity centers:

- Serviced by potable water and central wastewater systems;
- Accessible to employment centers, including shopping centers which accommodate stores offering household goods and services needed on a frequent and recurring basis;
- Located on a paved street accessible to a major street (i.e., included in the City's major thoroughfare plan);
- Accessible to public parks, recreation areas, and/or open space systems; and

- Located on sites having adequate surface water management and solid waste collection and disposal.

Annually the City shall promote the use of federal, state, and local subsidy programs, including Sec. 208 funding, to meet the need for affordable housing. The City Planner or other City representative directed by the City Manager shall meet with the Monroe County Planning Director and the Director of the City of Key West Housing Authority and by the end of 1992 draft a program for annual evaluation of affordable housing needs within the incorporated and unincorporated areas. The program shall include annual assessments, including recommended actions for the ensuing year. The annual assessment of affordable housing needs shall be presented to the City Planning and Zoning Board and the City Commission for action.

Furthermore, the City shall participate in South Florida Regional Planning council initiatives directed toward educating local governments of new techniques especially programs applicable to the region and/or the County, for promoting affordable housing. In drafting updated land development regulations, the City shall ensure that regulatory techniques and review procedures do not create barriers to affordable housing. The City shall also promote nondiscrimination in access to housing within the City by promoting fair housing laws and practices.

OBJECTIVE 3-1.2: MAINTAIN HOUSING STOCK FREE OF SUBSTANDARD UNITS. The City of Key West had 956 substandard housing units as of 1991, representing approximately 8.4 percent of the total housing stock based on a 1991 parcel by parcel field survey conducted by the City of Key West Planning Office. However, of these total 795 units or 83% of the total substandard units merely needed minor repair such as painting, screen repair, or weatherization. Only 161 or approximately one (1) percent of the City's total housing stock was dilapidated or uninhabitable based on the field study definitions contained on Page 3-10 of the housing data inventory and analysis. The City shall use the Community Development Block Grant Program and code enforcement programs to take necessary actions to correct existing deficiencies in order to achieve a housing stock free of substandard units.

Policy 3-1.2.1: Elimination of Substandard Housing Conditions and Structural and Aesthetic Improvement of Housing. Upon plan adoption the City shall initiate code enforcement provisions designed to enforce the housing code and the Southern Standard Building Code in order to protect and preserve the structural integrity and aesthetics of the City's housing stock. Substandard housing units shall continue to be identified. The City shall contact owners of substandard housing units in order to communicate necessary corrective actions and assist by informing owners of available federal, state and local housing assistance programs. Similarly, the City shall use the Community Development Block program to attract funds for necessary improvements.

OBJECTIVE 3-1.3: MANUFACTURED HOUSING. The City of Key West shall accommodate the demand for manufactured housing within its corporate limits at Poinciana Trailer Park, Mastic Trailer Park, Key West Trailer Park, the Naval Trailer Park (Note: The Navy Trailer Park is programmed for removal) and at the Bayside Trailer Park.

Policy 3-1.3.1: Location and Building Code Compliance. Building Codes within the City shall be consistent with State mandated criteria governing construction in coastal area. The City's land development regulations shall continue to allow manufactured housing in all residential zoning districts provided the manufactured housing complies with building standards of CH.320 and 553, FS., the U.S. Department of Housing and Urban Development Manufactured Home Construction and Safety Standards of 1974 (i.e., Sec.320.823, FS.), the land development regulations, including the City's historic guidelines which shall govern all structures with the Old Town Historic District.

Policy 3-1.3.2: Mobile Home Location Principles. Upon plan adoption the City's land development regulations shall be amended to include performance standards ensuring that mobile homes can be accommodated within areas zoned for mobile homes including sites identified in Objective 3-1.3.

OBJECTIVE 3-1.4: PROVIDE OPPORTUNITIES FOR GROUP HOMES, HOUSING FOR THE ELDERLY AND FOSTER CARE FACILITIES. Pursuant to the requirements of §163.3177(6) (3), F.S., the City shall promote housing opportunities to meet the unique housing needs of the elderly, dependent children, the physically and mentally handicapped, and the developmentally disabled.

Policy 3-1.4.1: Foster Care Facilities. Upon plan adoption the land development regulations shall be amended to include performance standards designed to advance the provision of foster care facilities within the City of Key West. The standards shall provide for licensed HRS single family foster care homes in all residential districts classified in the Zoning Code.

Policy 3-1.4.2: Group Homes. Upon plan adoption the land development regulations shall be amended to include performance standards which allow group homes in multiple family zoning districts providing they meet criteria established by Florida Statutes and administrative rules of the State Department of Health and Rehabilitative Services. In addition, such facilities shall be regulated in order to manage their location and intensity, including impacts on infrastructure and to encourage development on sites accessible to public and private services generally required by group home residents.

Policy 3-1.4.3: Housing for the Elderly. Upon plan adoption the land development regulations shall be amended to encourage development of housing alternatives specially designed for the elderly, including but not limited to adult care living facilities.

Sites for housing for the elderly shall be approved if such sites have access to the following facilities, services and/or activity centers:

- Serviced by potable water and central wastewater systems;
- Accessible to employment centers, including shopping centers which accommodate stores offering household goods and services needed on a frequent and recurring basis;
- Located on a paved street accessible to a major street (i.e., included in the City's major thoroughfare plan);
- Accessible to public parks, recreation areas, and/or open space systems; and
- Located on sites having adequate surface water management and solid waste collection and disposal.

OBJECTIVE 3-1.5: PRESERVE HISTORICALLY SIGNIFICANT HOUSING. Upon plan adoption housing resources identified as historically significant shall be preserved and protected for residential uses. Upon plan adoption the City shall enforce the historic preservation guidelines adopted by the City's Historic Architecture Review Committee in order to preserve the historic district (i.e., predominantly Old Town Key West) as described in the housing data inventory and analysis, including the abundant housing resources of historic significance. The Old Town defines an area of historic ambiance which is vital to the economic base of Key West since it attracts tourists and residents to this island community. Upon plan adoption, the future development of Old Town shall be carefully monitored through amended land development regulations. These regulations shall protect and preserve waterfront areas, a major natural amenity of the historic district. Cross reference Policies 1-2.3.3 and 1-3.2.6.

Policy 3-1.5.1: Preparation of Historic Preservation Element for Inclusion in Comprehensive Plan. Upon plan adoption the City shall prepare a Historic Preservation element for adoption by the City Commission. The City's Historical Architecture Review Commission (HARC) shall manage preparation of the element and submit the same to the Planning Board for review and transmittal to the City Commission for adoption. The element shall be prepared pursuant to §163.3177(7) (i), F.S. The HARC shall be assisted in the preparation of the element by the Historic Planner for purposes of ensuring coordination between the Historic Preservation Element and the land development regulations. Cross reference Policy 3-1.5.2.

Policy 3-1.5.2: Incorporate HARC Regulations in Land Development Regulations. Upon plan adoption the City's land development regulations shall be amended to incorporate the duties and responsibilities of the City of Key West Historical Architecture Commission in managing historical resources and in evaluating alterations, renovations, and rehabilitation efforts for the protection and preservation of historic resources in Key West. The regulations shall include administrative provisions and criteria for maintaining the island's unique architectural heritage and visual character.

Policy 3-1.5.3: Promote Identification of the City's Historically Significant Housing Resources. The City shall encourage the continued analysis, identification and preservation of the City's historical resources. Such efforts shall include determination of their worth and vulnerability, as well as implementation of preservation management policies as such resources are identified. These efforts shall be coordinated with the Key West Historical Architecture Review Commission (HARC).

Policy 3-1.5.4: Rehabilitation and Adaptive Re-Use of Historically Significant Housing. Assist the rehabilitation and adaptive re-use of historically significant housing through available technical and economic assistance programs. These efforts shall be coordinated with the State Division of Historical Resources.

Policy 3-1.5.5: Use of Subsidies and Grantsmanship Activities for Housing. The City shall assist households within the City in need of housing resources, home repair, low and moderate income housing, or funds to preserve historically significant housing by undertaking grantsmanship activities necessary to obtain available State, federal, and local subsidies to remedy the identified housing needs.

Policy 3-1.5.6: Identification of Conservation, Rehabilitation or Demolition Activities, and Historically Significant Housing or Neighborhoods. The City Planning Department shall continue to maintain a program of housing stock conservation, rehabilitation and demolition as may be appropriate. The City shall work with the City's Historical Architecture Review Commission (HARC) in identifying all locally historically significant structures and shall regulate preservation of such structures through the historical preservation ordinance. Coordination with the private sector, and the transfer of information related to public assistance for the renovation of historically significant structures shall be encouraged. The City of Key West shall assist the Historical Architecture Review Commission (HARC) in its efforts to provide public information, education, and technical assistance relating to historic preservation programs.

Policy 3-1.5.7: Improving Condition of Historic Housing Resources. Identify substandard housing listed in the Florida Master Site File and initiate a technical assistance program using historic preservation as a tool to revitalize deteriorating housing without causing displacement. Investigate using Inner City Ventures Fund of the National Trust for Historic Preservation, the Neighborhood Housing Services model and other funding sources and approaches.

Policy 3-1.5.8: Consideration of Historic Resources in Planning Studies. All public sector planning studies of neighborhoods, housing, transportation, drainage, stormwater and utilities will identify the presence of historic resources and the impact of any proposals on these resources.

Policy 3-1.5.9: Public Improvement Strategy for Enhancing Historic Resources. Develop a public improvement program for the National Register District that would include specific plans to enhance the public rights-of-way through appropriate utilities, streetscape improvements, landscaping and other improvements.

Policy 3-1.5.10: Design of Public Improvements In Historic Neighborhoods. When public improvements such as street lights, signage, sidewalks, traffic lights, and utilities are scheduled for replacements in recognized historic neighborhoods, those replacements shall be compatible with the character of the neighborhood. The HARC shall review the design concepts and building materials to prevent intrusion by incompatible structures.

OBJECTIVE 3-1.6: RELOCATION HOUSING. Uniform and equitable treatment of persons and businesses displaced by State and local government programs shall be provided consistent with §421.55, F.S.

Policy 3-1.6.1: Provide Alternative Housing Sites for Displaced Structures and Residents Thereof. Coordinate with the private sector in ensuring that alternative sites, in comparable housing facilities are available to persons displaced through public action prior to their displacement.

OBJECTIVE 3-1.7: CONSERVE NEIGHBORHOOD QUALITY AND EXISTING HOUSING STOCK. Neighborhoods shall be preserved through encouraging rehabilitation and/or basic maintenance of housing stock. Emphasis shall be placed on conservation of natural resources, maintenance of community facilities and enforcement of Codes.

Policy 3-1.7.1: Promote Maintenance of Housing Stock and Neighborhood Conservation. The City shall enforce all construction and land development regulations to promote maintenance of housing stock. Necessary corrective action shall be taken where non-compliance exists or when it comes into existence in the future.

Policy 3-1.7.2: Plan Supportive Facilities and Services Necessary for Quality Residential Neighborhoods. Sufficient systems for delivery of public facilities and services supportive to a quality residential environment shall be planned, designed and implemented. Such facilities shall include, but not be limited to, central water and wastewater services as well as maintenance of the roadway network and surface water management system. A capital improvement program and budget predicated on continuing review and evaluation of evolving housing problems and related infrastructure issues shall be the principal tool for realizing this objective.

Policy 3-1.7.3: Minimize Potential Blighting Influences. Potential blighting influences within residential areas shall be minimized by promoting use of best management principles and practices of land use planning, urban design and landscaping in development and site plan review. For instance, adverse impacts of land use transition shall be minimized by managing the location as well as the density or intensity of mixed or conflicting residential and nonresidential uses and by requiring adequate screening, landscaping, and other design features which promote land use compatibility and appropriate land use transition. Upon plan adoption the City shall institute, administer, and enforce a site plan review process. In addition, a multi-agency technical review process shall be developed as stipulated in the intergovernmental coordination Objective 8-1.4. The multi-agency review process shall be enforced to ensure greater efficiency in managing intergovernmental issues generated by large scale development.

Policy 3-1.7.4: Coordinate Public/Private Partnerships. In addressing housing issues requiring unique partnerships involving the public and private sector, the City shall promote effective communication and innovative approaches which involve partnerships between the public and private sectors.

Policy 3-1.7.5: Continuing Housing Programs. The City shall carry out the following housing related programs:

1. **Population and Housing Research and Information System.** Maintain and periodically update the population and housing information system.
2. **Housing Trends.** Monitor and evaluate population and housing trends. Analysis of land use interrelationships shall be included in the continuing evaluation.
3. **Review Plans and Policies.** Review and amend as necessary adopted plans and policies based on continuing analysis of problems and issues related to housing and other plan elements. Major shifts in the magnitude, distribution, and demographic characteristics of the population which are indicative of changes in housing demand shall be analyzed. Similarly, shifts in the magnitude, distribution and structural characteristics of the City's housing stock shall be analyzed on a continuing basis.
4. **Fiscal Management.** Review and evaluate residential development and infrastructure policy, including fiscal implications. Each year fiscal management policies including the capital improvement program and budget shall be reviewed, evaluated and refined to reflect current program priorities.
5. **Administer Housing Code and Other Related Codes.** Administer adopted housing and energy codes and other housing related codes.
6. **Public Assistance and Information Referral.** Provide housing information and referral services to the public pursuant to adopted goals, objectives and policies of this Housing Element.
7. **Intergovernmental Coordination.** Coordinate local housing program activities including discussions of related fiscal problems and issues with other public agencies at all levels of government pursuant to the Intergovernmental Element of this Plan.

8. **Manage Current Developmental Impacts.** Evaluate and manage impacts of proposed development pursuant to existing ordinances, including, but not limited to, impacts on residential neighborhoods, local housing supply and demand, public facility impacts, and natural environmental factors.
9. **Continuing Refinement of Housing Policies and Participation in the Comprehensive Housing Affordability Strategies (CHAS) Program.** The City shall maintain a continuing review and evaluation of housing policies as identified in this Element. The report entitled, Comprehensive Plan Data Inventory and Analysis shall be updated as soon as the 1990 Census data is available. This analysis shall provide a basis for continuing refinement of housing policies. Where such analysis reveals housing needs, required infrastructure improvements, or other related problems and issues, the City shall coordinate an effective response, including cooperation with the public and private sectors. The Housing Element will be developed in coordination with state and federal requirements under the Comprehensive Housing Affordability Strategies for the City of Key West.

Affordable Housing and Affordable Housing Applicant Eligibility Requirements for the Base Reuse sites shall be defined through the Housing Authority of the City of Key West's Affordability Policy, adopted July 1998. Amendments to said policy shall be incorporated into the Comprehensive Plan definition so long as they are first affirmatively approved by both the City of Key West and the Department of Community Affairs.

Said policy may be updated from time to time and shall be incorporated into the Comprehensive Plan definition, so long as they are first affirmatively approved by both the City of Key West and the Department of Community Affairs.

Policy 3-1.7.6: Special Housing Studies. In order to maintain housing policies responsive to changing conditions, problems, and issues, the City shall undertake special housing studies as needed in order to develop specific local strategies for resolving unanticipated housing problems and issues. The city shall conduct an analysis to identify funding options for affordable housing. Include a cost/benefit analysis of alternative management options, particularly as they relate to maintaining housing affordability in perpetuity.

OBJECTIVE 3-1.8: CONTINUING EVALUATION OF HOUSING ELEMENT EFFECTIVENESS. The City shall use the following policies as criteria in evaluating the effectiveness of the Housing Element.

Policy 3-1.8.1: Review the Impact of Change Indicators on Housing Policy. Major shifts in the magnitude, distribution, and characteristics of population and housing shall serve as indicators of change in various aspects of housing supply and demand. The policy implications of major changes in housing supply and demand shall be evaluated on a continuing basis. Housing policy shall be refined as needed in order to remain responsive to changing problems and issues.

Policy 3-1.8.2: Schedule, Budget and Implementing Programmed Activities. The timely scheduling, programming, budgeting and implementation of housing programs identified in this Element shall be evidence of the City's effectiveness in carrying out a systematic program for implementing adopted housing goals, objectives, and policies.

Policy 3-1.8.3: Coordinate with Public and Private Sectors. While continually implementing and evaluating the Housing Element, the City shall maintain a process of intergovernmental coordination as well as coordination with private sector groups interested in housing policy and programs. The effectiveness of this approach shall be evaluated by the success of coordination mechanisms in resolving housing problems and issues.

Policy 3-1.8.4: Achieve Effective Resolution of Housing Goals, Objectives, and Policies. The effectiveness of the Housing Element shall be measured by the City's success in achieving housing goals, objectives, and policies. The Housing Element incorporates a systematic planning process for identifying housing problems and issues and corrective actions.

